

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DENA ALEXANDER GLADNEY

(Name and Address of Defendant)

FILED

FEB 15 2008

2/15/08

CRIMINAL COMPLAINT

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

08CR 0136
MAGISTRATE JUDGE VALDEZ

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 6/28/2007 in LaSalle county, in the Northern District of Illinois defendant(s) did, (Track Statutory Language of Offense)

move and travel in interstate commerce to avoid prosecution for the Illinois felony of unlawful delivery of a controlled substance

in violation of Title 18 United States Code, Section(s) 1073

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:

Official Title

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant

R. BRIAN WENTZ

Special Agent

Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

February 15, 2008

Date

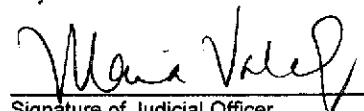
at

Chicago, Illinois

City and State

MARIA VALDEZ United States Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

A F F I D A V I T

I, R. BRIAN WENTZ, being duly sworn, depose and say:

1. I am employed as a Special Agent (SA) of the Federal Bureau of Investigation (FBI), Department of Justice, and have been so employed for over four years. I am currently assigned to the FBI's South Resident Agency in Orland Park, Illinois, where I investigate violent crimes. I am familiar with fugitive investigations. The information contained in this affidavit was furnished by Investigator David Guinee of the LaSalle County Sheriff's Office (LCSO), unless otherwise indicated.

2. On June 28, 2007, DENA ALEXANDER GLADNEY was charged in a criminal information in the Circuit Court of LaSalle County, Illinois, with two counts of unlawful delivery of controlled substance in that GLADNEY knowingly delivered more than 15 grams but less than 100 grams of a substance containing cocaine. This is a felony charge. An arrest warrant was issued the same day and is attached to this affidavit.

3. Law enforcement officials have been unable to locate GLADNEY in Illinois. As part of the LCSO's investigation, they recovered a letter allegedly sent by GLADNEY to his co-defendant,

LOUIS SHAW. The letter is dated August 15, 2007, and is notarized in the State of Michigan, County of Kalamazoo. The envelope has a Kalamazoo, Michigan, return address and postmark and is dated August 16, 2007. The letter stated, "To whom it may concern, LOUIS SHAW was unaware of my actions on dates listed below, May 22, 2007, May 31, 2007" and was signed "Dena Gladney". The May dates referred to are the dates of the transactions that led to the criminal charges.

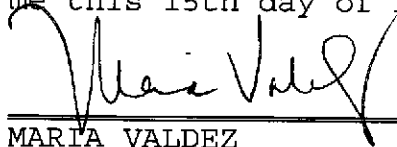
4. Based upon the information contained in this affidavit, I believe DENA ALEXANDER GLADNEY fled the State of Illinois to avoid prosecution for the unlawful delivery of a controlled substance.

5. The LaSalle County State's Attorney's Office will extradite GLADNEY when he is apprehended.



R. BRIAN WENTZ
Special Agent
Federal Bureau of Investigation

Subscribed and Sworn to before
me this 15th day of February 2008



MARIA VALDEZ
United States Magistrate Judge

CMR

FILED
JUN 28 2007

WARRANT

IN THE CIRCUIT COURT
LaSALLE COUNTY, OTTAWA, ILLINOIS

LA SALLE COUNTY CIRCUIT CLERK
THIRTEENTH JUDICIAL CIRCUIT OF ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)

vs.
DENA A. GLADNEY

Defendant.)

No. 2007-CF-364
COUNTS I & II

PEOPLE OF THE STATE OF ILLINOIS, TO ALL PEACE OFFICERS IN THE
STATE OF ILLINOIS:

WE COMMAND THAT YOU ARREST DENA A. GLADNEY, M/B,
D.O.B. LINCOLN ST., ARLINGTON, BUREAU COUNTY,
ILLINOIS, FOR THE OFFENSE OF UNLAWFUL DELIVERY OF CONTROLLED
SUBSTANCE (CLASS X FELONY) (TWO COUNTS), STATED IN A CHARGE NOW
PENDING BEFORE THIS COURT AND THAT YOU BRING HER IMMEDIATELY BEFORE
THE UNDERSIGNED JUDGE OR IF THAT JUDGE IS ABSENT OR UNABLE TO ACT,
BEFORE THE NEAREST OR MOST ACCESSIBLE COURT IN LaSALLE COUNTY OR IF
THIS WARRANT IS EXECUTED IN A COUNTY OTHER THAN LaSALLE, BEFORE THE
NEAREST OR MOST ACCESSIBLE JUDGE IN THE COUNTY WHERE THE ARREST IS
MADE.

BAIL: \$200,000 /10% TO APPLY

ENTER: June 28, 2007

J. W. Bales
JUDGE

EXECUTED BY:

FEES:
SERVICE:
MILEAGE:
TOTAL:

DEPUTY SHERIFF

DATE EXECUTED: _____

____ NO GEOGRAPHIC LIMITS
____ GEOGRAPHICAL LIMITS-SURROUNDING COUNTIES ONLY
____ GEOGRAPHIC LIMITS-STATE OF ILLINOIS ONLY
____ GEOGRAPHIC LIMITS-AMENDED PER COURT ORDER
____ OTHER

BRIAN J. TOWNE
STATES ATTORNEY



**OFFICE OF THE
STATE'S ATTORNEY
LASALLE COUNTY, ILLINOIS**

LASALLE COUNTY GOVERNMENTAL COMPLEX
707 ETNA ROAD, SUITE 251
OTTAWA, IL 61350

(815) 434-8340
Fax (815) 434-8357

January 16, 2008

RE: People of the State of Illinois vs. DENA GLADNEY
CASE NO: 2007-CF-364

To Whom It May Concern:

The above-captioned individual is currently wanted out of LaSalle County on a warrant. In the event this individual is apprehended, we will extradite.

If you have any questions, please contact me at the above number.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Vescozni", written over a circular stamp.

BRIAN K. VESCOZNI
CHIEF DEPUTY STATE'S ATTORNEY

BKV:lar
Enc.

CRIMINAL INFORMATION

IN THE CIRCUIT COURT
LASALLE COUNTY, OTTAWA, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

VS.

DENA A. GLADNEY

and

LOUIS E. SHAW

Defendant.

NO. 2007-CF-
COUNT I OF II

NO. 2007-CF-
COUNT I OF II

BRIAN J. TOWNE, STATE'S ATTORNEY OF LASALLE COUNTY,
ON THIS June 28, 2007 ON OATH ALLEGES THAT ON OR ABOUT MAY 22,
LASALLE COUNTY, ILLINOIS, DENA A. GLADNEY, M/B, D.O.B.

ST., ARLINGTON, BUREAU
M/B, D.O.B.
GLESBY, ILLINOIS 61348

COMMITTED THE OFFENSE OF

UNLAWFUL DELIVERY OF CONTROLLED SUBSTANCE (CLASS X FELONY) IN THAT
THE SAID DEFENDANT KNOWINGLY DELIVERED MORE THAN 15 GRAMS BUT LESS
THAN 100 GRAMS OF A SUBSTANCE CONTAINING COCAINE, A CONTROLLED
SUBSTANCE, OTHER THAN AS AUTHORIZED IN THE CONTROLLED SUBSTANCE
ACT,

IN VIOLATION OF SECTION 570/401(a)(2)(A), CHAPTER 720, ILLINOIS
COMPILED STATUTES, RYAN CANTLIN, ASSISTANT STATE'S ATTORNEY, WHO ON
OATH AFFIRMS THAT THE ALLEGATIONS SET FORTH HEREIN ARE TRUE.

RYAN CANTLIN
ASSISTANT STATE'S ATTORNEY

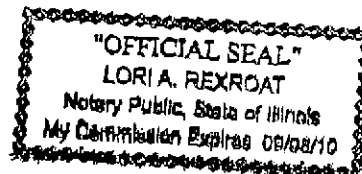
SIGNED AND SWORN TO BEFORE ME June 28, 2007.

(X) NOTARY PUBLIC () CLERK () JUDGE

BRIAN J. TOWNE
STATE'S ATTORNEY
LASALLE COUNTY GOVERNMENTAL COMPLEX
707 ETNA ROAD, ROOM 251
OTTAWA, IL 61350

BAIL SET AT \$

JUDGE



CRIMINAL INFORMATION

IN THE CIRCUIT COURT
LASALLE COUNTY, OTTAWA, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

DENA A. GLADNEY

and

LOUIS Z. SHAW

Defendant.

NO. 2007-CF-
COUNT II OF II

NO. 2007-CF-
COUNT II OF II

BRIAN J. TOWNE, STATE'S ATTORNEY OF LASALLE COUNTY,
ON THIS June 28, 2007 ON OATH ALLEGES THAT ON OR ABOUT MAY 31,
2007. IN LASALLE COUNTY, ILLINOIS. DENA A. GLADNEY, M/B, D.O.B.
1 F 1 ARLINGTON, BUREAU
C 2 and D.O.B.
OF 24 SBY, ILLINOIS 61348
SE OF:

UNLAWFUL DELIVERY OF CONTROLLED SUBSTANCE (CLASS X FELONY) IN THAT
THE SAID DEFENDANT KNOWINGLY DELIVERED MORE THAN 15 GRAMS BUT LESS
THAN 100 GRAMS OF A SUBSTANCE CONTAINING COCAINE, A CONTROLLED
SUBSTANCE, OTHER THAN AS AUTHORIZED IN THE CONTROLLED SUBSTANCE
ACT,

IN VIOLATION OF SECTION 570/401(a)(2)(A), CHAPTER 720, ILLINOIS
COMPILED STATUTES, RYAN CANTLIN, ASSISTANT STATE'S ATTORNEY, WHO ON
OATH AFFIRMS THAT THE ALLEGATIONS SET FORTH HEREIN ARE TRUE.

RYAN CANTLIN
ASSISTANT STATE'S ATTORNEY

SIGNED AND SWORN TO BEFORE ME June 28, 2007.

(X) NOTARY PUBLIC () CLERK () JUDGE

BRIAN J. TOWNE
STATE'S ATTORNEY
LASALLE COUNTY GOVERNMENTAL COMPLEX
707 ETNA ROAD, ROOM 251
OTTAWA, IL 61350



BAIL SET AT \$

JUDGE

INDICTMENT

IN THE CIRCUIT COURT
LASALLE, COUNTY, ILLINOIS, AT OTTAWA, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,
PLAINTIFF,
-VS-

DENA A. GLADNEY

And

LOUIS Z. SHAW
DEFENDANT.

NO. 2007-CF-364
COUNT I

NO. 2007-CF-365
COUNT I

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT MAY 22, 2007, IN LASALLE COUNTY, ILLINOIS, DENA A. GLADNEY,
DEFENDANT, AND LOUIS Z. SHAW, DEFENDANT, COMMITTED THE OFFENSE OF:
UNLAWFUL DELIVERY OF CONTROLLED SUBSTANCE (CLASS X FELONY)

IN THAT THE SAID DEFENDANT KNOWINGLY DELIVERED MORE THAN 15 GRAMS BUT LESS
THAN 100 GRAMS OF A SUBSTANCE CONTAINING COCAINE, A CONTROLLED SUBSTANCE,
OTHER THAN AS AUTHORIZED IN THE CONTROLLED SUBSTANCE ACT,

IN VIOLATION OF SECTION 570/401(a)(2)(A), CHAPTER 720, ILLINOIS COMPILED STATUTES.
A TRUE BILL.

DATE:

July 10, 2007

Clara J. Jorgensen
FOREMAN, GRAND JURY

NAMES OF WITNESSES UPON WHOSE EVIDENCE THIS INDICTMENT WAS FOUND:
TASK FORCE
INSPECTOR GERTON
BRIAN J. TOWNE, STATE'S ATTORNEY
LASALLE COUNTY GOVERNMENTAL COMPLEX
707 ETNA ROAD, Room 251
OTTAWA, IL 61350
TELEPHONE NO.: (815) 434-8340

INDICTMENT

IN THE CIRCUIT COURT
LASALLE, COUNTY, ILLINOIS, AT OTTAWA, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,
PLAINTIFF,
-VS-

DENA A. GLADNEY

And

LOUIS Z. SHAW
DEFENDANT.

NO. 2007-CF-364
COUNT II

NO. 2007-CF-364
COUNT II

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT MAY 31, 2007, IN LASALLE COUNTY, ILLINOIS, DENA A. GLADNEY,
DEFENDANT, AND LOUIS Z. SHAW, DEFENDANT, COMMITTED THE OFFENSE OF:
UNLAWFUL DELIVERY OF CONTROLLED SUBSTANCE (CLASS X FELONY)

IN THAT THE SAID DEFENDANT KNOWINGLY DELIVERED MORE THAN 15 GRAMS BUT LESS
THAN 100 GRAMS OF A SUBSTANCE CONTAINING COCAINE, A CONTROLLED SUBSTANCE,
OTHER THAN AS AUTHORIZED IN THE CONTROLLED SUBSTANCE ACT,

IN VIOLATION OF SECTION 570/401(a)(2)(A), CHAPTER 720, ILLINOIS COMPILED STATUTES.
A TRUE BILL.

DATE:

July 10, 2007

Charm Dryden
FOREMAN, GRAND JURY

NAMES OF WITNESSES UPON WHOSE EVIDENCE THIS INDICTMENT WAS FOUND:
TASK FORCE
INSPECTOR GIRTON
BRIAN J. TOWNE, STATE'S ATTORNEY
LASALLE COUNTY GOVERNMENTAL COMPLEX
707 ETNA ROAD, Room 251
OTTAWA, IL 61350
TELEPHONE NO.: (815) 434-8340